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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	
)	Case No.: 2:12-cr-063-PMP-CWH
Plaintiff,)	
)	
vs.)	
)	MOTION TO UNSEAL GOVERNMENT'S
ROSS HACK,)	MOTION IN LIMINE TO ADMIT AT
MELISSA HACK, and)	TRIAL DEFENDANT JONES'S
LELAND JONES,)	STATEMENTS
)	
Defendants.)	

The United States of America, by and through Daniel G. Bogden, United States Attorney, and Nicholas D. Dickinson, Assistant United States Attorney, for the District of Nevada, and by and through Jocelyn Samuels, Acting Assistant Attorney General, and Patricia A. Sumner and Julia Gegenheimer, Trial Attorneys, for the Civil Rights Division of the Department of Justice, hereby moves to unseal the government's Motion in Limine to Admit at Trial Defendant Jones's Statements (Doc. 241). On March 6, 2014, Judge Hoffman granted defendant Ross Hack's

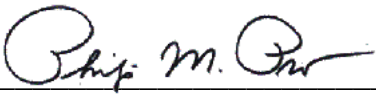
1 Motion to Amend C.R. 108 (the confidential discovery protective order) in which defendant
 2 Hack proposed the following amendment to the protective order, among others: “references to
 3 the identity of witnesses and to the content of statements should be permitted in pretrial motions,
 4 pleadings and other documents filed with the court – the complete statement if necessary would
 5 be filed under seal.” Document 186 at pp. 2-3. In accordance with Judge Hoffman’s verbal
 6 order granting defendant Hack’s motion, the government requests that the Court unseal the
 7 government’s Motion in Limine to Admit at Trial Defendant Jones’s Statements (Doc. 241).
 8 However, also in accordance with Judge Hoffman’s order amending the protective order, the
 9 exhibits filed with the government’s motion – which are complete witness statements, including
 10 grand jury transcripts – should remain under seal.

11 Dated this 5th day of June 2014.

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13 Respectfully submitted,

14 IT IS SO ORDERED:

15 DANIEL G. BOGDEN
16 United States Attorney

16 
 17 PHILIP M. PRO, U.S. District Judge
 18 June 6, 2014

19 By: /s/ Nicholas D. Dickinson
 20 NICHOLAS D. DICKINSON
 21 Assistant United States Attorney

22 JOCELYN SAMUELS
 23 Acting Assistant Attorney General
 24 Civil Rights Division

By: /s/ Patricia A. Sumner
 PATRICIA A. SUMNER
 Trial Attorney

By: /s/ Julia Gegenheimer
 JULIA GEGENHEIMER
 Trial Attorney

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